



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

VIA ECF

The Honorable Vernon S. Broderick
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED

SO ORDERED *Wen Bin*

VERNON S. BRODERICK

U.S.D.J. 6/18/2024

All discovery deadlines are hereby STAYED until
one week after the settlement conference.

Re: *Johnson v. United States of America*, 22-cv-8008 (VSB)

Dear Judge Broderick:

This Office represents the United States of America (the “Government”) in the above-referenced action brought by plaintiff Gladys Johnson (“Plaintiff”) pursuant to the Federal Tort Claims Act. I write jointly with counsel for Plaintiff to respectfully request a referral to a Magistrate Judge for a settlement conference, and to request a temporary stay of the remaining discovery deadlines outlined in the Amended Case Management Plan and Scheduling Order, ECF No. 36, until one week after the settlement conference.

Fact discovery is complete, and the parties have served expert reports. The deadline to complete all discovery, including expert depositions, is July 3, 2024. ECF No. 36. The parties have started to discuss settlement and believe that there is a greater likelihood of the parties reaching an agreement with the Court’s involvement. We therefore request referral to a Magistrate Judge for a settlement conference. The parties also believe that staying expert discovery now would permit the parties to potentially avoid the costs associated with expert depositions. Accordingly, the parties respectfully request a temporary stay of the remaining discovery deadlines until one week after the settlement conference, at which point the parties will provide an update to the Court on the status of settlement discussions and/or request permission to complete expert discovery.

I thank the Court for its consideration of this letter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

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(VIA ECF)